

# EXHIBIT A

**DEFENDANT ARMSTRONG WORLD INDUSTRIES, INC.'S INITIAL  
DEPOSITION DESIGNATIONS**

March 8, 2019

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This preliminary list identifies the deposition testimony Armstrong expects to offer or that it may offer at trial if the need arises. Armstrong reserves its right to amend or supplement its list. Specifically, Armstrong reserves its right to delete testimony that is identified as being repetitive or otherwise unnecessary. Armstrong reserves its right to add testimony in response to Plaintiff's deposition list or to use at trial any deposition testimony identified in Plaintiff's pretrial memorandum or deposition list. Armstrong reserves its right to use at trial testimony not listed on its deposition testimony list for purposes of impeachment, cross-examination, or rebuttal. Armstrong further reserves the right to supplement this preliminary list after review of Rockfon's pretrial memorandum and after presentation of Rockfon's case-in-chief at trial. Armstrong further reserves the right to include any additional evidence discovered between now and trial and to add exhibits whose relevance is not yet apparent.